





ALLEN V. SCHEINER, on Behalf of Himself and All Others Similarly Situated.

Civil No. 3:01-C $\sqrt{-418}$ -H (Consolidated)

Plaintiff,

v.

CLASS ACTION

i2 TECHNOLOGIES, INC., SANJIV S. SIDHU, GREGORY A. BRADY and WILLIAM M. BEECHER,

Defendants.

JOINT STATUS REPORT

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The parties in the above-captioned action hereby submit the following Joint Status Report pursuant to the Order entered on April 15, 2002.

1. Current Status of the Case. This is a securities fraud class action on behalf of purchasers of i2 common stock between May 4, 2000 and February 26, 2001, inclusive (the "Class Period"), seeking to pursue remedies under the Securities Exchange Act of 1934 (the "Exchange Act"). On April 11, 2002, the Court denied defendants' motion to dismiss plaintiffs' Amended and Consolidated Complaint (the "Complaint"). Pursuant to the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), all other matters had been stayed during the pendency of defendants' motion to dismiss.

JOINT STATUS REPORT

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- (a) <u>Parties' Contentions</u>. The parties' contentions are separately submitted as Exhibits A and B hereto.
- 2. Pending and Contemplated Motions. There are no pending motions. Plaintiffs shall file a motion for class certification ninety (90) days from the entry of this Joint Status Report. Defendants shall have sixty (60) days from the filing of the motion to complete any necessary discovery and to respond to plaintiffs' motion for class certification. Plaintiffs shall have forty-five (45) days to file a reply memorandum of law in support of their motion for class certification, if necessary. As set forth below, the parties also anticipate that a motion for summary judgment may be filed at the conclusion of discovery.
- 3. <u>Any Matters Which Require a Conference With the Court</u>. The parties do not believe that any matters require a conference with the Court at this time.
- 4. <u>Likelihood that Other Parties Will be Joined</u>. The parties do not believe it is likely that any other parties will be joined at this time.
- 5. <u>Discovery</u>. The parties shall have eighteen (18) months from the entry of this Order to complete fact discovery. Plaintiffs shall serve their expert witness(es) report(s) thirty (30) days after the completion of fact discovery. Defendants shall serve their expert witness(es) report(s) within thirty (30) days thereafter. Upon service of the Defendants' expert witness(es) report(s), the parties shall have forty-five (45) days to complete expert discovery. The Parties shall have thirty (30) days from the completion of expert discovery to move for summary judgment. Opposition papers to any motion for summary judgment shall be filed

within forty-five (45) days of service of the motion and reply briefs shall be due thirty (30) days thereafter.

- 6. <u>Necessity of Discovery Scheduling Conference</u>. The parties have agreed to the discovery schedule outlined in paragraph 5, above, and do not believe that there is a need for a conference with the Court.
- 7. <u>Attorneys' Responsibilities</u>. Counsel have read and are familiar with this Court's Civil Justice Expense & Delay Reduction Plan, effective July 1, 1993.
- 8. Requested Trial Date. The parties believe that a trial date should be scheduled for the late Summer or Fall of 2004. An estimate of the length of trial is difficult at this time, however, it is anticipated that a trial of this action will consume several weeks. A jury has been demanded.
- 9. <u>Trial Before Magistrate</u>. The parties do not consent to a trial of this action before Magistrate Judge Jane J. Boyle (or her successor).
- 10. <u>Mediation</u>. The parties are willing to mediate or participate in other means of alternative dispute resolution. However, the parties believe that such discussions or actions are premature until the parties have completed initial fact discovery. All counsel have reviewed the option of early mediation with their clients.
- 11. <u>Prospects for Settlement</u>. No settlement discussions have occurred. Counsel do not believe that settlement discussions will be productive until the parties have engaged in initial merits discovery.
- 12. <u>Any Other Matters Relevant to the Status and Disposition of This Case</u>. None at this time.

Dated this 2nd day of May, 2002.

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Counsel for Defendants

SO ORDERED THIS ____ day of May, 2002

U.S. DISTRICT JUDGE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served this 2^{nd} day of May, 2002, on the following counsel via the method indicated:

Mr. Keith E. Eggleton WILSON SONSINI GOODRICH & ROSATI, P.C. 650 Page Mill Road Palo Alto, CA 94304-1050	□ via certified mail, RRR □ via fax # 650/565-5100 □ via first-class, U.S. mail □ via overnight delivery □ via hand delivery
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